

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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ILA LaFRENTZ, JIM LaFRENTZ,
KATHERINE PORTERFIELD, and
WILLIAM LaFRENTZ, Individually
and as Representatives of the
Estate of JAMES B. LaFRENTZ,

Plaintiffs,

-vs-

Civil Action No.:
4:18-cv-04229

3M COMPANY, et al.,

Defendants.

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ZOOM VIDEO DEPOSITION OF BARBARA J. HALLSTEIN
Tuesday, January 12, 2021

Reported by:
Jeannette McCormick

1 Q. And that's, generally speaking, because once
2 the exposure has occurred, that exposure can't be
3 undone; is that fair?

4 A. Yes.

5 Q. Generally speaking, as an industrial
6 hygienist, in order to properly sample for a
7 contaminant, you have to know what contaminant
8 you're looking for, correct?

9 A. Correct.

10 Q. And how is it that you would have known in
11 this circumstance that you were looking for asbestos
12 when you sampled Mr. LaFrentz?

13 A. In what circumstance are you talking about?

14 Q. The report that you've seen in this case that
15 took place in February of 1980.

16 A. I cannot recall. That was so long ago. I
17 can't recall actually any particulars.

18 Q. Do you recall --

19 A. As far as --

20 Q. I apologize. What was that?

21 A. As far as monitoring, I can't recall any
22 particulars. That was such a long time ago.

23 Q. Do you recall whether there was any labeling
24 or bulk sampling that took place that allowed you to
25 understand that what you were sampling for was

1 asbestos?

2 MR. NORCROSS: Objection. It calls for
3 speculation. She's told you she doesn't
4 recall even taking the sample of
5 Mr. LaFrentz, much less the --

6 MR. PEEK: Chris?

7 MR. NORCROSS: -- events surrounding it.

8 MR. PEEK: Keep the objections concise.
9 Let's not coach the witness.

10 MR. NORCROSS: I'm not --

11 BY MR. PEEK:

12 Q. You can answer the question, ma'am.

13 MR. NORCROSS: Being consistent with
14 what she's already testified to.

15 THE WITNESS: Okay. Can you repeat
16 that, please?

17 BY MR. PEEK:

18 Q. Do you recall whether there was any product
19 labeling or bulk sampling that took place that
20 allowed you to understand you were looking for and
21 sampling for asbestos when this took place?

22 MR. NORCROSS: Again, the same
23 objections. It calls for speculation.

24 THE WITNESS: I cannot say that I
25 remember taking this air sample. It was such

1 a long time ago.

2 BY MR. PEEK:

3 Q. When you were hired by General Dynamics, what
4 was your actual job title?

5 A. Industrial Hygienist.

6 Q. And what -- at that point in time, do you
7 recall what the division was named that you worked
8 in?

9 A. Do you mean like Fort Worth division? Is
10 that what you mean?

11 Q. No, ma'am. I've seen some references to the
12 bioenvironmental health division or the industrial
13 hygiene division within the sort of the safety
14 umbrella.

15 A. Okay.

16 Q. Do you recall what it was named when you were
17 there?

18 A. I think when I first hired on, it was
19 bioenvironmental health.

20 Q. And when you started, you were titled an
21 Industrial Hygienist.

22 How long did you maintain that title?

23 A. Probably ten years.

24 Q. What were your daily job duties and tasks as
25 an Industrial Hygienist for General Dynamics during

1 the circumstances that we're discussing here in the
2 sampling, or is it a different time?

3 A. I remember taking an air sample on
4 Mr. LaFrentz some time probably within seven years
5 after I started work there. I cannot attest that
6 it's this particular case. I don't recall this
7 particular air sample result that I have here.

8 Q. So I just want to make sure I understood what
9 you said.

10 Some time possibly within with the first
11 seven years of you starting there, you do recall
12 sampling Mr. LaFrentz at some point?

13 A. I do.

14 Q. Do you recall what you were sampling for?

15 A. I don't recall. It was a particulate, but
16 that's all I remember.

17 Q. You agree that the document you see there,
18 the contaminant being sampled for was asbestos,
19 correct?

20 MR. NORCROSS: Objection. It calls for
21 speculation. She's told you she's not
22 familiar with the document. If you can
23 answer, go ahead.

24 THE WITNESS: I did not generate that
25 document, and I'm not sure who did generate

1 it or who filled it out.

2 BY MR. PEEK:

3 Q. But taking the document for what it is as it
4 sits there, that particular document says that
5 asbestos was the contaminant being sampled for,
6 correct?

7 MR. NORCROSS: Objection. Calls for
8 speculation. She's told you she is not
9 familiar with the document, Brad. She didn't
10 create it.

11 THE WITNESS: Yeah, I didn't create this
12 document. I'm not actually sure who created
13 the document, and I haven't seen it until
14 just recently.

15 BY MR. PEEK:

16 Q. But you would agree with me that there, the
17 contaminant, as it is listed, is asbestos,
18 regardless of where that document came from --

19 MR. NORCROSS: Objection.

20 Q. -- it does actually say asbestos, correct?

21 MR. NORCROSS: Objection. Calls for
22 speculation, and it's a compound question.
23 Are you asking her if the document says the
24 word asbestos on it? Are you calling -- I'm
25 not clear, and I don't think she's clear, on

1 Material Safety Data Sheet, that would be
2 how.

3 BY MR. PEEK:

4 Q. Ma'am, do you remember the Industrial Hygiene
5 Safe Practice Instructions regarding asbestos that
6 were in place at General Dynamics?

7 A. I know that we had them, but I have not
8 reviewed them.

9 Q. You haven't looked at any in preparation for
10 today's deposition, have you?

11 A. No, I haven't.

12 Q. Do you recall being informed of the use of
13 asbestos-containing adhesives in plastics in
14 Building 5 there where Mr. LaFrentz worked?

15 A. I don't recall.

16 Q. Do you recall that that was a provision of
17 the Industrial Hygiene Safe Practice Instruction in
18 1977?

19 A. No, I don't recall that.

20 Q. Do you recall when you did sample
21 Mr. LaFrentz, the time that you do recall, was there
22 any sort of exhaust ventilation of any kind around
23 his equipment that he was using?

24 A. I don't recall.

25 Q. As you sit here today, do you recall that the

1 materials he was using with the belt sander that you
2 recall contained asbestos?

3 **A. I do not recall.**

4 Q. As you sit here today and you recall the
5 encounter with Mr. LaFrentz, was there any sort of
6 wet-down procedure or method that he was utilizing
7 in conjunction with the belt sander?

8 MR. NORCROSS: Objection. You've asked
9 and she's answered these questions, Brad.
10 She doesn't recall any of the circumstances
11 surrounding the air sample that she recalls
12 taking of Mr. LaFrentz.

13 BY MR. PEEK:

14 Q. You can answer the question.

15 **A. No, I don't recall.**

16 Q. I think I'm going to go ahead and show you
17 the June 1977 Industrial Hygiene Safe Practice
18 Instruction. I will share it on the screen here.
19 There are some sections that are highlighted that
20 aren't necessarily going to -- you're not going to
21 be asked about them, but I will point you to the
22 sections where I'd like to ask you about.

23 MR. PEEK: Counsel, this is GD_LaFrentz_
24 1115, a document produced by you.

25 MR. NORCROSS: What's the date on that,